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**VIA ECF**

The Honorable Colleen McMahon  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Michael Pappagallo, et al.*, No. 19-cr-545 (CM)**

Dear Judge McMahon:

On behalf of Defendant Michael Pappagallo in the above-captioned case, I write respectfully to follow up on Defendant's May 25, 2021 request that the Court exercise its discretion to expunge the record of Mr. Pappagallo's arrest. *See* ECF No. 99. On May 24, 2021, the Court granted a nearly identical motion filed by Mr. Pappagallo's co-defendant, Michael Carroll. *See* ECF No. 98. As the Government concluded in seeking dismissal of its indictment, this prosecution was "not in the interest of justice." Consequently, expungement is appropriate here.

We thank the Court for its consideration of this request.

Respectfully submitted,

*s/Daniel P. Filor*

Daniel P. Filor  
Charles Berk  
*Counsel for Michael Pappagallo*